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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 5, 1998

Mr. Jackson Kinzer
U.S. Department of Energy
P.O. Box 550, MSIN: S7-50
Richland, WA 99352

Mr. Anthony Umek
Fluor Daniel Hanford, Incorporated
P.O. Box 1000, MSIN: S7-40
Richland, WA 99352

Mr. Dale Allen
Lockheed Martin Hanford Corporation
P.O. Box 1500, MSIN: R2-50
Richland, WA 99352



Dear Messrs. Kinzer, Umek, and Allen:

Re: Completion of Project W-058, Replacement of Cross-Site Transfer System, per Tri-Party Agreement (TPA) Interim Milestone M-43-07

Thank you for the assistance of the U.S. Department of Energy (USDOE), Fluor Daniel Hanford Company (FDH), and Lockheed Martin Hanford Corporation (LMHC) personnel during the Washington State Department of Ecology's (Ecology) recent inspection of Project W-058, Replacement of the Cross-Site Transfer System.

USDOE notified Ecology by letter dated May 29, 1998, that Project W-058, Replacement of the Cross-Site Transfer System, had been completed and TPA Interim Milestone M-43-07 had been met. Ecology performed an inspection of project W-058 in July 1998. The purpose of this inspection was twofold: (1) to assess completion of Project W-058 and M-43-07, and (2) to assess readiness of the new cross-site transfer system in conjunction with existing transfer systems (i.e. existing transfer lines, double contained receiver tanks, etc) to safely accommodate waste transfers from double shelled tank storage in the 200 West Area to double shelled tank storage in the 200 East Area.

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As a result of the July 1998 inspection, Ecology concurs that Project W-058 has been successfully completed and M-43-07 has been met. However, Ecology's July inspection did reveal the following concerns regarding waste transfers via the new cross-site transfer system in conjunction with existing transfer systems:

#1) Assessment of Waste Compatibility.

Assessment of waste compatibility to the cross-site transfer system is accomplished through a review performed by LMHC engineering and documented, per cross-site transfer procedure TO-430-500, in a compatibility memo. However, Ecology understands that the guidelines for developing this compatibility memo are based on the provisions of procedure HNF-SD-DQO-001, "Data Quality Objectives for Tank Farms Compatibility Program." Ecology worked collaboratively with USDOE and the contractors throughout 1996 and into 1997 to develop these data quality objectives (DQO); however, concurrence between USDOE, the contractors, and Ecology was not reached on some key elements of the DQO. HNF-SD-DQO-001 states that Ecology does not concur with the document.

Areas of concern to Ecology that are pertinent to developing the compatibility memo referenced in the cross-site transfer procedure include the following:

- Performing safety assessments for parameters important to safety issues such as flammable gas content, impact of waste on transfer systems, and waste mixing. To this end Ecology recommends obtaining samples from both the receiving tank and the source tank, prior to waste transfers through the cross-site transfer system, to enable a better determination of safety hazards associated with waste transfers and waste mixing.
- Adjusting flush water pH for corrosion protection.
- Sampling and analyzing waste from 102-SY prior to initiating transfers to help prevent line clogging due to physical changes to the waste from pressure and temperature differentials during transfers.

Ecology recommends these issues be negotiated as soon as possible.

#2) Continued Use of the 244-A Double Contained Receiving Tank (DCRT).

Ecology understands that current planning for the Double Shell Tank (DST) transfer system includes the possibility of extending the cross-site transfer system to bypass the 244-A DCRT. Ecology did not see firm scheduling for completion of this project, known as the "Greenfield" Project, and how the Greenfield Project would impact the future mission of the 244-A DCRT.

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Ecology is concerned that permitting and upgrades to meet interim status requirements pertaining to the 244-A DCRT (upgrades and tank integrity assessment) may be unduly postponed due to uncertainty regarding the continued mission of the 244-A DCRT. Ecology recommends a schedule for meeting interim status requirements, or closure of the facility should the Greenfield Project bypass it, be negotiated with Ecology as soon as possible.

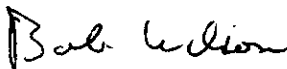
#3) Maintenance of Leak Detection in New Cross-Site Transfer System.

LMHC's readiness assessment report included post-start item # 058-D-011 which required measures be instituted to ensure long-term operability of the cross-site transfer system continuous leak detector system by June 30, 1998. However, LMHC reported on October 8, 1998, that this action had not been completed. Ecology is concerned that post-start items such as this may impact operation of the cross-site transfer system and questions whether their categorization as "post-start" is accurate.

Discussions regarding the three concerns listed above should be initiated with Tony Valero, Ecology's Tank Waste Remediation System (TWRS) Storage Project Manager. Mr. Valero may be contacted at (509) 736-5719. Ecology considers the July 1998 inspection into completion of project W-058 closed; however, resolution to the concerns listed above may be revisited in future inspections.

If you have any questions regarding this letter, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:sb

cc: James Rasmussen, USDOE
Brad Erlandson, LMHC
Steve Szendre, FDH
Mary Lou Blazek, OOE
Administrative Record: TWRS